

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

VIRGINIA BRADFORD, Individually and	§	
as Heir and Legal Representative of the	§	
ESTATE OF FRED HAROLD BRADFORD,	§	
JR., (Deceased),	§	
Plaintiff,	§	CIVIL ACTION NO.
	§	
vs.	§	3:13-CV-2966-B
	§	
THE CITY OF DALLAS, BRYAN KENT	§	
BURGESS, MICHAEL PUCKETT, and	§	
DAVID BROWN,	§	
Defendants.	§	

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

TO THE HONORABLE COURT:

Plaintiff, Virginia Bradford, and Defendants, the City of Dallas, Bryan Kent Burgess, Michael Puckett, and David Brown (collectively, “the Parties”), pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, stipulate to the dismissal with prejudice of all claims by the Parties. The Parties respectfully request that the Court take note of this stipulation, and that the dismissal of these claims and of this civil action be noted on the Court’s docket.

Respectfully submitted,

LAW OFFICES OF BEN C. MARTIN, LLP

/s/ Ben C. Martin [ with permission ]

Ben C. Martin

State Bar No. 13052400

Thomas Wm. Arbon

State Bar No. 01284275

Russell T. Burton

State Bar No. 24077428

3219 McKinney Avenue, Suite 100

Dallas, Texas 75204

214/761-6614 (Voice) 214/744-7590 (Facsimile)

**ATTORNEYS FOR PLAINTIFF**

Respectfully submitted,

WARREN M. S. ERNST  
Dallas City Attorney

*/s/ Jason G. Schuette*  
Executive Assistant City Attorney  
Texas Bar No. 17827020  
[jason.schuette@dallascityhall.com](mailto:jason.schuette@dallascityhall.com)

Grant H. Brenna  
Senior Assistant City Attorney  
Texas Bar No. 00789170  
[grant.brenna@dallascityhall.com](mailto:grant.brenna@dallascityhall.com)

City Attorney's Office  
1500 Marilla Street, Room 7B North  
Dallas, Texas 75201  
Telephone: 214-670-3519  
Telecopier: 214-670-0622

**ATTORNEYS FOR DEFENDANTS  
CITY OF DALLAS AND DAVID BROWN**

Respectfully submitted,

*/s/ Gerald Bright [ with permission ]*  
Gerald Bright  
State Bar No. 02991720  
[gerald.bright@wblpc.com](mailto:gerald.bright@wblpc.com)  
David L. Craft  
State Bar No. 00790522  
[david.craft@wblpc.com](mailto:david.craft@wblpc.com)  
WALKER BRIGHT, P.C.  
100 North Central Expressway, Suite 800  
Richardson, Texas 75080  
972/744-0192 (Voice)  
972/744-0067 (Facsimile)

**ATTORNEYS FOR DEFENDANT  
MICHAEL PUCKETT**

Respectfully submitted,

/s/ Edwin P. Voss, Jr. / with permission /

Edwin P. Voss, Jr.

State Bar No. 20620300

BROWN & HOFMEISTER, L.L.P.

740 East Campbell Road, Suite 800

Richardson, Texas 75081

214/747-6100 (Voice) 214/747-6111 (Facsimile)

[evoss@bhlaw.net](mailto:evoss@bhlaw.net)

**ATTORNEY FOR DEFENDANT**

**BRYAN KENT BURGESS**

### **CERTIFICATE OF SERVICE**

I certify that on 26 December 2013 I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

Ben C. Martin

Thomas Wm. Arbon

Russell T. Burton

Law Offices of Ben C. Martin, LLP

*Attorneys for Plaintiff*

William M. "Billy" Ravkind

Ravkind & Associates, L.L.C.

*Attorney for Plaintiff*

Edwin P. Voss, Jr.

Brown & Hofmeister, L.L.P.

*Attorney for Defendant Bryan Kent Burgess*

Gerald Bright

David L. Craft

Walker Bright, P.C.

*Attorneys for Defendant Michael Puckett*

*s/ Jason G. Schuette*

Executive Assistant City Attorney